

HIGBEE & ASSOCIATES

605 W. Genesee Street, Ste. 101
Syracuse, NY 13204

Ray L. Ngo, Esq. (*Of Counsel*)
NY Attorney Registration #4780706
715 East 3900 South, Ste. 209
Salt Lake City, UT 84107

48 Wall St., Ste. 1100
New York, NY 10005

Ph: 801-268-2982

Fax: 888-257-4118

rngo@higbeeassociates.com

*So ordered. The conference previously set
for 3-20-20 is hereby adjourned to
4-24-20 at 10:00am.*

Mar. 16, 2020

FILED VIA ECF AND COPY FAXED TO CHAMBERS

3-19-20

(212) 805-7942

Hon. Alvin K. Hellerstein
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl St., Courtroom 14D
New York, NY 10007-1312

**USDC SDNY
DOCUMENT
ELECTRONICALLY FILED**

Re: Stipulated Request to Adjourn Initial Pretrial Conference

Docket: 1:19-cv-11221-AKH

Title: Daniel McKnight v. The Brad Lebeau Co., Inc. et al.

DOC #:

DATE FILED: *3-17-20*

Dear Judge Hellerstein:

I am counsel for the Plaintiff in the above copyright infringement matter. The Complaint was filed on 12-6-19. Service on Defendant was completed on 12-23-19, and was accepted by the NY Department of State, as the statutorily designated agent to accept service on Defendant's behalf (ECF No. 8). On 1-13-20, the Defendant, through counsel, filed a timely Answer (ECF No. 10).

This matter is currently scheduled for an initial conference this Friday on ~~3-19-20~~ ^{*3-20-20*}. The parties have been actively negotiating and making progress towards a final resolution, and are now closer than ever before. I sincerely believe they will reach a final resolution without the necessity of further judicial intervention, and thereby preserve judicial time and resources and reduce litigation expenses for both sides.

The Defendant and their counsel have expressed their consent to this request for adjournment. No prior requests for adjournment have been made by either party.

For those reasons, I respectfully requests that the initial conference currently scheduled on ~~3-19-20~~ ^{*3-20-20*} be adjourned, preferably for a minimum of 30 days. In the event the Court denies this request for adjournment, I request that counsel be permitted to appear telephonically in order to mitigate the risks to themselves and to court staff amid the current corona virus outbreak.

Respectfully,

/s/ Ray L. Ngo

Ray L. Ngo
Counsel for Plaintiff

CC: All counsel of record